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December 1, 2020

To: Hon. Analisa Torres (by ECF)
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Paleja v. KP NY Operations LLC, Case No. 20cv475 (AT)

Dear Judge Torres:

I represent the Plaintiff in the above-referenced action. I am writing in response to counsel's letter of yesterday regarding the failure of the attorneys to meet face to face in order to discuss settlement.

I am a bit perplexed by Defendant's letter as he did not call me, email me, or reach out to me in any way to schedule a settlement meeting before contacting the Court. Although face-to-face meetings such as those contemplated by Your Honor's Order are disfavored at the moment due to the epidemic situation, I have no objection to having either a face-to-face meeting at the courthouse or meeting via a teleconferencing service.

Accordingly, I have contacted Defendant's counsel by email and proposed three dates and times for such a meeting.

I would respectfully request that the Court disregard Defendant's letter and give the attorneys the opportunity to schedule a settlement discussion without judicial intervention.

To the extent that Defendant is improperly seeking an extension of time to complete discovery from Your Honor, I oppose such request for the reasons stated in my letter of November 17, 2020 (Docket No. 64). I also note that Defendant's counsel made no attempt at all to have an oral discussion with me before submitting his most recent letter. Nor did he make any attempt to provide me with the opportunity to take part in a joint letter to the Court.

Respectfully yours,

/s/ David Abrams

David Abrams

cc: Defendant's Counsel